

BERKSHIRE GAS COMPANY
D.T.E. 02-81

FIRST SET OF INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
BERKSHIRE GAS COMPANY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to Berkshire Gas Company ("Berkshire" or "Company") the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve one (1) copy of the responses on Mary Cottrell, Secretary of the Department and on all parties; also submit two (2) copies of the responses to Jesse S. Reyes, Hearing Officer and one (1) copy *addressed separately* to each of the other Department staff members and persons listed on the latest distribution list in this proceeding.
8. In addition to filing, all non-proprietary responses are to be submitted by e-mail to dte.efiling@state.ma.us and to the e-mail address of any party required to be served.
9. Responses must be filed with the Department no later than 5:00 p.m. on **Friday, January 17, 2003**.

INFORMATION REQUESTS

- D.T.E. 1-1 Please refer to pages 4 and 5 of Ms. Zink's testimony. How does the Company determine whether it should approach acquisitions of commodity on a stand-alone basis or as part of a consortium? In your response, please explain why, in this case, Berkshire chose to solicit RFPs on a stand-alone basis instead of being part of a consortium to secure a replacement supply for the expiring Dynegy and Aquila contracts as the Company did in D.T.E. 02-56.
- D.T.E. 1-2 Please refer to pages 4 and 5 of Ms. Zink's testimony. What was the total cost associated with conducting the replacement process on a stand-alone basis? In the Company's estimation, what would it cost Berkshire to conduct the replacement process had the Company been part of a consortium?
- D.T.E. 1-3 Please refer to pages 4 through 11 of Ms. Zink's testimony. Please explain how, and to what extent, Berkshire's existing relationship with BP Energy affected the evaluation of the bids submitted to the Company in response to the RFP and the selection of BP Energy as the winning bid.
- D.T.E. 1-4 Please refer to pages 3 and 4 of Ms. Zink's testimony. Please outline the portfolio objectives in the Company's most recent Forecast and Supply Plan submitted to the Department in D.T.E. 02-17. In relation to these objectives, show how the Gas Purchase Agreement is in the public interest.

- D.T.E. 1-5 Please refer to pages 3 and 4 of Ms. Zink's testimony. Please list the "range of alternatives reasonably available to the Company and its customers," and discuss how the BP Energy resource compares favorably to these alternatives. In your response, please discuss whether the "range of alternatives" include both domestic and foreign resources.
- D.T.E. 1-6 Please refer to Ms. Zink's testimony and to Exhibit KLZ-1. Has the Company entered into an agency or management services agreement for the purpose of implementing the Gas Purchase Agreement with BP Energy? Please explain.
- D.T.E. 1-7 Please refer to Exhibit KLZ-1, "Gas Purchase Agreement." Please discuss whether BP Energy has defaulted on any of its gas supply obligations to customers in the past 10 years.